



Brad Weinischke
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September 2, 2014

Tennessee Department Environment & Conservation
Will Collins
Division of Air Quality

Subject: Variance Request for Stage II
Murphy Oil USA #8700, Permit # 94-0355-01/68454
3028 Bellshire Village Drive
Spring Hill, Tennessee

Dear Sir/Madam:

Murphy Oil USA (MUSA), Inc. is submitting this letter to your office as record of our desire to defer from using stage II equipment at this location. We are making this request based on the Federal EPA ruling o May 16, 2012 that would appear to allow states to phase out their stage II vapor recovery programs.

Your department has requested additional information to support this request. For your records:

- the below ground piping necessary to operate a stage II system will be installed as a precautionary step. (Note: see FD1 of construction plans submitted)
- the cost to convert dispensers back to stage II compliant dispenser would cost \$5,000 per dispenser, plus an additional \$1,000 in labor per dispenser. Total cost to convert back to stage II would be \$48,000.
- annual equipment cost to operate a stage II system before final ratification of state rules is estimated at \$8,500.

New construction in other states are encountering the same challenges as you. We ask for this variance with the understanding that the state may come back at a later date and require that stage II equipment be installed at that time

If you have any questions regarding anything discussed in this letter please do not hesitate to call me.

Sincerely,

Brad Weinischke
Senior Specialist, HSSE Environmental Compliance Coordinator
Murphy Oil USA, Inc.
200 East Peach Street
El Dorado, AR 71730